

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-7, SUB 1249

In the Matter of: )  
Application of Duke Energy )  
Carolinas, LLC for Approval of )  
Demand-Side Management and )  
Energy Efficiency Cost Recovery )  
Rider Pursuant to N.C. Gen. Stat. § )  
62-133.9 and Commission Rule )  
R8-69 )

PETITION OF NCSEA TO  
INTERVENE

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Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, the North Carolina Sustainable Energy Association (“NCSEA”) hereby petitions to intervene in the above-referenced docket. In support of this petition, NCSEA states as follows:

1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located across the State. NCSEA’s mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.

2. NCSEA was a chief proponent of North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard (“REPS law”), has substantial organizational awareness of the law and its implementation, and has a direct interest in seeing the policies and goals of the REPS law achieved in a manner consistent with the legislative intent. The interest of NCSEA and its members in the REPS law, renewable energy, and energy

efficiency extends to dockets such as this one for a multitude of reasons. NCSEA's interest in cases such as this one has been recognized by the Commission. *See, e.g.*, Commission Docket No. E-7, Sub 1230 (Vintage 12 Rider); Commission Docket No. E-7, Sub 1192 (Vintage 11 Rider); Commission Docket No. E-7, Sub 1164 (Vintage 10 rider); Commission Docket No. E-7, Sub 1130 (Vintage 9 rider); Commission Docket No. E-7, Sub 1105 (Vintage 8 rider); Commission Docket No. E-7, Sub 1073 (Vintage 7 rider); Commission Docket No. E-7, Sub 1050 (Vintage 6 rider); Commission Docket No. E-7, Sub 1031 (Vintage 5 rider); Commission Docket No. E-7, Sub 1001 (Vintage 4 rider); Commission Docket No. E-7, Sub 831 (NCSEA was permitted to intervene where Duke Energy Carolinas, LLC sought approval of Save-a-Watt and its first energy efficiency rider); see also Commission Docket No. E-100, Sub 110 (a pre-REPS complaint brought by NCSEA against Duke Energy Carolinas, LLC to require increased use of energy efficiency).

3. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

4. NCSEA's address is 4800 Six Forks Road, Suite 300, Raleigh, NC 27609.

All correspondence related to this proceeding should be addressed to:

Peter H. Ledford  
General Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org

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Regulatory Counsel  
NCSEA  
4800 Six Forks Road  
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5. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

**WHEREFORE**, for the reasons set forth above, NCSEA prays that it be allowed to intervene in this matter.

Respectfully submitted,

          /s/ Peter H. Ledford            
Peter H. Ledford  
N.C. State Bar No. 42999  
General Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org

VERIFICATION

Peter Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of NCSEA.

This the 8th day of April, 2021.

  
\_\_\_\_\_  
Peter Ledford

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 8th day of April, 2021.

[AFFIX SEAL OF NOTARY]

  
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Notary Public

Sarah R. McQuillan  
Printed Name of Notary Public  
My Commission Expires: 5/31/2021



CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 8th day of April, 2021.

      /s/ Peter H. Ledford        
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General Counsel  
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